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Attorney for Emmanuel Nava

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:24-cr-00054-DJC
Plaintiff,)	STIPULATION REGARDING
vs.)	EXCLUDABLE TIME PERIODS
EMMANUEL NAVA and JOSE PEDRO)	UNDER SPEEDY TRIAL ACT AND
NAVA,)	ORDER
Defendants.)	Date: September 19, 2024
)	Time: 9:00am
)	Judge: Hon Judge Daniel J. Calabretta

STIPULATION

1. By previous order, this matter was set for status on September 19, 2024.
2. By this stipulation, the defendants now move to continue the status conference until October 31, 2024, at 9:00 a.m., and to exclude time between September 19, 2024, and October 31, 2024 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for the defendants desire additional time to review offers from the US Attorney's Office.

- 1 b) Counsel for the defendants believe that failure to grant the above-requested
2 continuance would deny them the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.
4 c) The government does not object to the continuance.
5 d) Based on the above-stated findings, the ends of justice served by continuing
6 the case as requested outweigh the interest of the public and the defendant in a
7 trial within the original date prescribed by the Speedy Trial Act.
8 e) For the purpose of computing time under the Speedy Trial Act, 18
9 U.S.C. § 3161, et seq., within which trial must commence, the time period of
10 September 19, 2024 to October 31, 2024, inclusive, is deemed excludable
11 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4]
12 because this is a complex case and it results from a continuance granted by the
13 Court at defendant's request on the basis of the Court's finding that the ends of
14 justice served by taking such action outweigh the best interest of the public and
15 the defendant in a speedy trial.
16 4. Nothing in this stipulation and order shall preclude a finding that other provisions
17 of the Speedy Trial Act dictate that additional time periods are excludable from
18 the period within which a trial must commence.

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20 **IT IS SO STIPULATED.**
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23 DATED: September 6, 2024

PHILLIP A. TALBERT
United States Attorney

25 /s/ Emily Sauvageau
26 EMILY SAUVAGEAU
27 Assistant U.S. Attorney
28

1 DATE: September 6, 2024

2 /s/ Thomas A. Johnson
3 THOMAS A. JOHNSON
4 Attorney for Emmanuel Nava

5 DATE: September 6, 2024

6 /s/ Neat Allen Sawyer
7 NEAT ALLEN SAWYER
8 Attorney for Jose Pedro Nava
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14 **ORDER**

15 IT IS SO FOUND AND ORDERED this 6th day of September 2024

16
17 Dated: September 6, 2024

18 /s/ Daniel J. Calabretta
19 THE HONORABLE DANIEL J. CALABRETTA
20 UNITED STATES DISTRICT JUDGE
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